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4 5 6 7 8	KYLE F. WALDINGER (ILSB 6238304) Assistant United States Attorney 450 Golden Gate Avenue, 11th Floor San Francisco, California 94102 Telephone: (415) 436-6830 Facsimile: (415) 436-7234 Attorneys for Plaintiff
9	UNITED STATES DISTRICT COURT
10	NORTHERN DISTRICT OF CALIFORNIA
11	SAN FRANCISCO DIVISION
12	UNITED STATES OF AMERICA,) No. CR 06-0030 JSW
13)
14	Plaintiff,) STIPULATION AND [PROPOSED]
15	v.) ORDER DOCUMENTING) <u>EXCLUSION OF TIME</u>
16	NANCY PUA, JOHNNY LEE TAN, and
17	KEVIN PUA,
18	Defendants.
19	With the agreement of the parties in open courts on March 9, 2006, and with the co

With the agreement of the parties in open courts on March 9, 2006, and with the consent of the defendants Johnny Lee Tan and Kevin Pua, the Court enters this order (1) setting a hearing on March 23, 2006 at 2:30 p.m. and (2) documenting the exclusion of time under the Speedy Trial Act, 18 U.S.C. § 3161, from March 9, 2006 to March 23, 2006. The parties agree, and the Court finds and holds, as follows:

1. The defendants Johnny Lee Tan and Kevin Pua appeared before the Court with new counsel on March 9, 2006. Counsel for the government informed the Court that the codefendant Nancy Pua had been arrested in Los Angeles, was being transported in custody to this District, and was due in this District imminently. Counsel for the government also noted that the government would be producing a significant amount of discovery immediately, that several

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1	additional boxes of discovery would be produced thereafter, and that the government would also
2	make available for inspection a large number of counterfeit goods currently in the government's
3	custody. Counsel for each of the defendants needs time to review the large amount of discovery
4	to be produced and to be made available by the government. Continuing the case until March 23,
5	2006 will give counsel some opportunity to accomplish this objective.
6	2. The Court finds that, taking into the account the public interest in the prompt
7	disposition of criminal cases, granting the continuance until March 23, 2006 is necessary based
8	on the complex nature of this case arising from the large amount of discovery and based on
9	effective preparation of counsel. See 18 U.S.C. § 3161(h)(8)(B)(ii) & (iv). Given these
10	circumstances, the Court finds that the ends of justice served by excluding the period from March
11	9, 2006 to March 23, 2006 outweigh the best interest of the public and the defendant in a speedy
12	trial. <u>Id.</u> § 3161(h)(8)(A).
13	3. Accordingly, and with the consent of the defendants, the Court (1) sets a hearing
14	for March 23, 2006 at 2:30 p.m. and (2) orders that the period from March 9, 2006 to March 23,
15	2006 be excluded from Speedy Trial Act calculations under 18 U.S.C. § 3161(h)(8)(A) & (B)(ii)
16	& (iv).
17	SO STIPULATED.
18	DATED: /S/ KVLEE WALDINGER
19	Assistant United States Attorney
20	
21	DATED: /S/ SHANA KEATING
22	Attorney for the defendant Johnny Lee Tan
23	DATED: /S/
24	DATED: /S/ DAVID FERMINO Attorney for the defendant Kevin Pua
25	Actioney for the defendant revini I du
26	IT IS SO ORDERED.
27	DATED: March 15, 2006
28	JEFFRE STATE White United States District Judge

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